

CERTIFIED NO. P 447 526 763

January 20, 1986

US EPA RECORDS CENTER REGION 5



1004608

Ms. Lorna Jereza - 5H3-13
U. S. Environmental Protection Agency
230 S. Dearborn
Chicago, IL 60604

Dear Ms. Jereza:

Re: Request for variance from classification as a Solid Waste

Per your request, BASF Corporation, Chemicals Division, is forwarding to your attention, simplified process flow diagrams and associated written descriptions covering (1) the Wyandotte Works Vitamin Complex heptane and methanol solvent recovery systems, and (2) the Troy Plant's methylene chloride recovery system. BASF understands this information will be made available to interested parties during the public notice procedure associated with the pending requests for variance.

Very truly yours,

A handwritten signature in black ink, appearing to read 'H. D. Roush', written over the typed name.

H. D. Roush
Manager
Quality Assurance and
Environmental Affairs

mh
enc.

VITAMIN COMPLEX SOLVENT RECOVERY

Heptane

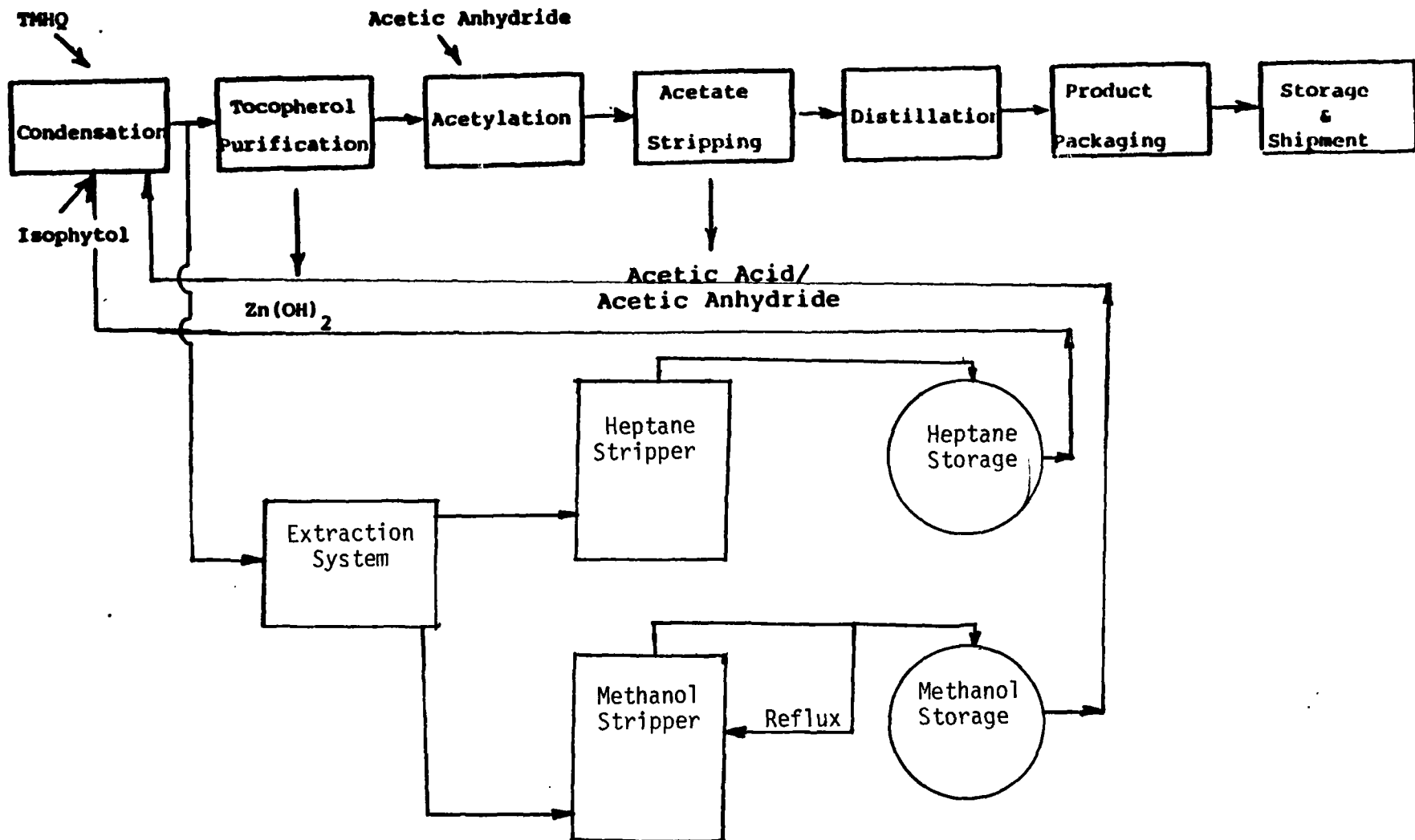
The light phase from the extraction system is the heptane Vitamin E mixture. It is pumped to the heptane stripper where the heptane is stripped with steam and taken overhead, condensed and returned to the recovered heptane storage tank for reuse.

Methanol

The heavy phase from the extraction system is methanol, water and impurities. It is pumped to the methanol stripper where the methanol is stripped with steam and condensed. Part of the methanol stream is returned to the stripper as reflux, the remainder is cooled and is pumped to the recovered methanol storage tank for reuse.

Process Flow Diagram

Vitamin E Plant



RECORD OF COMMUNICATION		<input type="checkbox"/> PHONE CALL <input type="checkbox"/> DISCUSSION <input type="checkbox"/> FIELD TRIP <input type="checkbox"/> CONFERENCE <input type="checkbox"/> OTHER (SPECIFY) _____	
		(Record of item checked above)	
TO: <div style="text-align: center; font-size: 1.2em;">File</div>	FROM: <div style="text-align: center; font-size: 1.2em;">L. M. JEREZA</div>	DATE <div style="text-align: center; font-size: 1.2em;">12-31-85</div>	TIME <div style="text-align: center; font-size: 1.2em;">12/31/85</div>
SUBJECT <div style="text-align: center; font-size: 1.2em;">Request for Variance - BASF Wyandotte Corp. MID 064197742</div>			
SUMMARY OF COMMUNICATION <div style="font-family: cursive;"> <p>USEPA received a letter on July 16, 1985 from BASF Wyandotte Corporation requesting a variance from classifying as a solid waste two separate reclaimed process streams composed of heptane and methanol respectively. These streams which exhibit the RCRA characteristic of ignitability, are reclaimed on-site and then reused as feedstock within the original primary production process from which the streams were generated from the Vitamin Complex of the facility's Wyandotte Works in Wyandotte, Michigan.</p> <p>USEPA and the MDNR have completed a review of the above request pursuant to the provisions of 40 CFR 260.31, "Standards and Criteria for Variances from Classification as a Solid Waste," (<u>Federal Register</u> Vol. 50, No. 3, Friday, Jan. 4, 1985). Based on this review, the agency has granted a tentative decision to grant a variance to BASF Wyandotte Corp.</p> </div>			
CONCLUSIONS, ACTION TAKEN OR REQUIRED <div style="font-family: cursive;"> <p>thereby eliminating from classification as "solid waste", the reclaimed process streams of heptane & methanol.</p> </div>			
INFORMATION COPIES TO: _____			

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
ENE J. FLUHARTY
EN V. MONSMA
WART MYERS
D. D. OLSON
RAYMOND POUPORE
HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909

RONALD O. SKOOG, Director

December 18, 1985

RECEIVED

DEC 24 1985

SOLID WASTE DIVISION
U.S. EPA REGION V

Ms. Edith Ardiente, Chief
Technical Programs Section, 5HS-13
U.S. EPA - Region V
230 South Dearborn
Chicago, Illinois 60604

RE: Request for Variance-BASF Wyandotte
Wyandotte, Michigan MID064197742

Dear Ms. Ardiente:

This is to confirm my recent telephone conversation with Lorna Jereza and in follow-up to my August 28, 1985, letter regarding the above-referenced company's request for variance from classification as a solid waste. The information contained in their July 9, 1985, request has been field verified by our Compliance Section staff, who concurs that the variance should be granted.

Sincerely,

Cheryl Howe, Environmental Engineer
Hazardous Waste Division
Technical Services Section
517-373-2730

cc: Ms. L. Jereza, EPA
Ms. M. Murphy, EPA
Ms. M. Fields, Detroit District, HWD
Mr. K. Burda/Part B File

STATE OF MICHIGAN



JAMES J. BLANCHARD, Governor

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RECEIVED

SEP 19 1985

August 28, 1985

SWB - AIS
U.S. EPA, REGION V

Ms. Edith Ardiente, Chief
Technical Programs Section, 5HS-13
U.S. EPA-Region V
230 South Dearborn
Chicago, Illinois 60604

Re: Request for Variance from
Classification as a Solid Waste
BASF Wyandotte Corporation
Wyandotte, Michigan
MID 064197742 *C T&D PA*

Dear Ms. Ardiente:

The above-referenced request for a variance classifying two separate reclaimed process streams (heptane and methanol) as solid wastes has been reviewed.

The written request meets the standards and criteria set forth in 40 CFR 260.31(b). However, our compliance staff have not yet verified the information through a field inspection.

It was noted that the request is signed by the Director of Corporate Environmental Protection. The applicable regulations do not specify who is required to sign the request, but since the requestor is referred to as an "applicant", it appears that the request should be signed in accordance with 40 CFR 270.11.

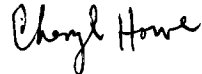
Ms. Edith Ardiente

-2-

August 28, 1985

If the information in the request can be field verified and the question of whether the request is properly signed can be resolved, we recommend proceeding with the issuance of a notice tentatively granting the application and commencement of the public comment period required under 40 CFR 260.33(b).

Sincerely,



Cheryl Howe, Environmental Engineer
Technical Services Section
Hazardous Waste Division
517-373-2730

cc: Lorna Jereza
Mary Murphy
Ken Burda
Ben Okwumabua
C & E File
File



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

Long
COPY FOR YOUR
INFORMATION

REPLY TO THE ATTENTION OF

5HS-13

JUL 23 1985

Mr. Alan J. Howard, Chief
Technical Services Section
Hazardous Waste Division
Michigan Department of Natural Resources
P.O. Box 30028
Lansing, Michigan 48909

RE: *REQUEST FOR VARIANCE*
~~Closure Plan~~
BASF WYANDOTTE CORP.
WYANDOTTE MICHIGAN
MID 064 197742

Dear Mr. Howard:

Enclosed is/are ONE (1) copy(s) of a *REQUEST FOR VARIANCE* ~~closure plan~~ for the
referenced facility. Please perform a technical evaluation of the plan, and
provide us your comments by AUGUST 15, 1985.

If you have any questions on the *REQUEST FOR VARIANCE* ~~closure plan~~, please contact L.M. Jereza
of my staff, at (312) 886-7457.

Sincerely,

Edith M. Ardiente
Edith M. Ardiente, P.E.
Chief, Technical Programs Section

Enclosure(s)

cc: Mary Higgins
HWDMS Update File

Sept. 6 - For Public Notice (to info unit)

BASF Wyandotte Corporation

BASF



RECEIVED

100 Cherry Hill Road
PO. Box 181
Parsippany, N.J. 07054
201/263-5280

Keith Fry
Director
Corporate Environmental Protection

JUL 16 1985

SOLID WASTE BRANCH
U.S. EPA. REGION V

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
P35 1210879

July 9, 1985

Regional Administrator
USEPA, Region V
230 South Dearborn Street
Chicago, Illinois 60604

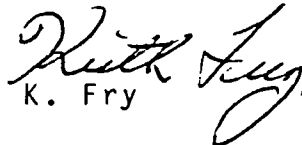
Re: Request for Variance from Classification as a Solid Waste

Dear Sir:

BASF Wyandotte Corporation is hereby requesting a variance from classification as a solid waste for separate process streams from the Vitamin Complex of our Wyandotte Works in Wyandotte, Michigan. These streams, which exhibit the RCRA characteristic of ignitability, are reclaimed on-site and then reused as feedstock within the original primary production process from which the streams were generated. The reclamation operation is an essential part of the production process.

This request has been prepared pursuant to §260.30(b) of the general regulations for hazardous waste management 40 CFR 260. Please direct any questions or correspondence concerning this matter to Mr. A. D. Gillen at the above address.

Very truly yours,


K. Fry

/cir
enclosure

cc: A.D. Gillen

REQUEST FOR VARIANCE FROM
CLASSIFICATION AS A SOLID WASTE

BASF WYANDOTTE CORPORATION
WYANDOTTE WORKS
1609 BIDDLE AVENUE
WYANDOTTE, MICHIGAN 48192

EPA ID No.--MID 064197742

9 July 1985

Pursuant to §260.31(b), the following is provided to support BASF Wyandotte Corporation's request for a variance from classification as a solid waste for two separate reclaimed process streams composed of heptane and methanol respectively.

Justification

The annual heptane requirement for the production facility is 260,000 gallons of which 250,000 gallons (96.2%) is provided by reclamation. At a present cost of \$2.26 per gallon, the annual savings in purchased raw material alone is \$565,000. In addition, the cost of disposal (incineration) of this liquid stream, if not reclaimed, would be approximately \$1.70 per gallon, for an annual total of \$425,000.

This total additional annual expense of \$990,000 would prohibitively impact the viability of the business.

The annual methanol requirement for the production facility is 500,000 gallons, of which 493,000 gallons (98.6%) is provided by reclamation. At a present cost of \$1.03 per gallon, the annual savings in purchased raw material is \$508,000. Adding the cost of incinerating this liquid stream if it is not reclaimed, an additional cost of \$2.00 per gallon would be realized. This would total \$987,000 per year.

Again, the total additional annual expense of almost \$1.5 million would severely impact the viability of the business.

BASF Wyandotte Corporation is continuously seeking ways to increase its control over the ultimate disposition of secondary materials. To this end, the company is decreasing the use of off-site reclamation/treatment/disposal facilities which do not thermally destroy secondary materials. If unable to reclaim, treat or dispose of a material on-site, the company will pursue incineration as the primary means of off-site disposition. While initially more expensive than off-site reclamation, the potential liability, as evidenced with recent involvement in several CERCLA remediation actions, has dictated this position.

This practice of reclamation is prevalent on an industry-wide basis. Both streams are reclaimed via steam stripping followed by condensation. This simple reclamation process is viable due to the characteristics of the materials and the large amounts used each year. The material is contained, in a closed-loop system, from the time it leaves the reactor until it is returned, in its reclaimed form, to its respective storage tank for reuse.

The generation and reclamation of each stream is continuous and occurs only when production is underway. There is no intermediate storage during the entire process. The reclamation operation is in the same process building as the production facility and is considered part of the production process by the operations group.

Returning the reclaimed material to its raw material storage tank verifies the material is used for its original purpose. The same specifications used to purchase the raw materials are applied to the reclaimed materials.

BASF Wyandotte Corporation owns and operates the contiguous facilities which use, reclaim and reuse these materials.

Receipt of a variance from classification as a solid waste for these two process streams will allow BASF Wyandotte Corporation to continue to minimize the amount of hazardous waste generated as well as relieve both the company and the agency from the recordkeeping requirements applicable to the generation of hazardous waste.

BASF Wyandotte Corporation



RECEIVED

100 Cherry Hill Road
PO Box 181
Parsippany, N.J. 07054
201/263-5280

Keith Fry
Director
Corporate Environmental Protection

JUL 16 1985

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cc: A.D. Gillen

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CLASSIFICATION AS A SOLID WASTE

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